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May 14, 2020

Honorable Judge William H. Orrick
San Francisco Courthouse
450 Golden Gate Avenue
San Francisco, CA 94102

Re: *Reece v. Altria Group, Inc. et al*, 20-cv-02345-WHO;
In Re: Juul Labs, Inc., Marketing, Sales Practices, and Products Liability Litigation, 19-md-02913-WHO

Your Honor:

We represent Plaintiffs in three antitrust cases now related to the *Reece* action: (1) *Martinez v. Altria Group, Inc.*, et al., 20-cv-02597-WHO; (2) *Deadwyler v. Altria Group, Inc.*, et al., 20-cv-02729-WHO; (3) *Flannery v. Altria Group, Inc.*, et al., 20-cv-02891-WHO; and a fourth that was filed today: *Redfield, et al., v. Altria Group, Inc., et al.*, 20-cv-03288.

The Court has scheduled a Case Management Conference in MDL No. 19-md-2913, *In Re: Juul Labs, Inc., Marketing, Sales Practices, and Products Liability Litigation* (“Juul MDL”) and a hearing on the motion for leave to file an amended consolidated complaint. ECF. 421. Plaintiffs have received the Clerk’s Notice setting the hearing as a Zoom conferencing webinar. ECF No. 548.

Plaintiffs and Defendants in the *Juul MDL* filed a Joint Case Management Statement, which references “certain counsel who have filed antitrust actions...have filed notices of intent to participate in the May 15, 2020 Case Management Conference,” but does not identify the *Martinez*, *Deadwyler*, *Flannery*, and *Redfield* Plaintiffs. (ECF No. 551 (citing ECF No. 535)). As it pertains to the claims at issue in *Reece*, Plaintiffs *Martinez*, *Deadwyler*, *Flannery*, and *Redfield* respectfully request the opportunity to participate in the hearing.

If requested by the Court, Plaintiffs also would be prepared to speak to issues regarding the status of the antitrust cases and the question of

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whether they should be related to the *Juul MDL* for purposes of coordination or consolidation.

Respectfully,

Joseph R. Saveri

cc: All Counsel (by ECF)